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September 27, 2022

VIA ECF

Honorable Judge Maria M. Henry
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Government Employees Ins. Company, et al. v. Stybel, et al.*
Case No. 1:22-cv-02834-PKC-MMH
RR File No.: 005100-03539

Dear Judge Henry:

As you know, we represent Plaintiffs Government Employees Insurance Co., GEICO Indemnity Co., GEICO General Insurance Company, and GEICO Casualty Co. (collectively, "Plaintiffs") in connection with the above-referenced litigation. Plaintiffs and Defendants previously filed a Proposed Discovery Plan on September 7, 2022. See ECF 19.

Plaintiffs respectfully submit this letter in accordance with Rule III.C.2 of Your Honor's individual rules regarding the Protective Order in this matter. Plaintiffs met and conferred with Defendants on these proposed changes, and Defendants have no objection to Plaintiffs' proposed changes. Plaintiffs believe additional language is required due to the circumstances of the case, specifically GEICO's intention to produce large volumes of insurance company files which include, among other documents, patient records, attorney-client communications, and attorney work-product (the "Claim Files"). This language provides additional details on the protections afforded to the Claim Files consistent with the other language in the form Protective Order. Plaintiffs have attached as Exhibit 1 a clean copy of the form Protective Order and as Exhibit 2 the redlined comparison between the proposed order and the form Protective Order. The only proposed change is to add this Paragraph 16 to Your Honor's form Protective Order.

We thank the Court for its time and continuing attention to this matter.

Respectfully submitted,

RIVKIN RADLER LLP

/s/ Michael Vanunu

Michael Vanunu

cc: All counsel via ECF